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*Attorneys for Plaintiff**Johnson & Johnson Health Care Systems Inc.***UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY****JOHNSON & JOHNSON****HEALTH CARE SYSTEMS INC.,**

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,**

Defendants.

COUNSEL:

:

Civil Action No. 22-2632(JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

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NOTICE OF MOTION TO SEAL

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PLEASE TAKE NOTICE that on January 6, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. (“JJHCS”) will apply before the Honorable

Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with (i) the Motion of Defendant Save On SP, LLC (“SaveOnSP”) to Compel JJHCS to Produce Documents Regarding its CAP Program from its Vendor TrialCard, dated October 25, 2024, with related briefing and status letters dated October 7, October 10, November 4, and November 12, 2024 (ECF Nos. 410, 425, 433, 450 & 464), filed October 14, October 29, November 5, November 13, and December 10, 2024 (the “TrialCard Motion”); and (ii) SaveOnSP’s Motion to Compel JJHCS to Produce Financial Modeling, dated October 28, 2024 (ECF No. 426), filed October 29, 2024 (the “Financial Modeling Motion”); and
- (b) Permitting JJHCS to file the proposed public versions of ECF Nos. 410, 425, 433, 450 & 464; and ECF No. 426, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support

of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

PLEASE TAKE FURTHER NOTICE that no party objects to the relief requested.

Respectfully submitted,

Dated: December 10, 2024

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